



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

APR 24 2012

UNITED PARCEL SERVICE  
E-MAIL VERIFICATION REQUIRED

Mr. Frank Fort  
Plant Manager  
Williams Field Services, Gulf Coast, L.P.  
6000 Rock Road  
Codan, Alabama 36523

SUBJ: **Clean Air Act Compliance Order and Information Request**  
**EPA Docket No. CAA-04-2012-1778**

Dear Mr. Fort:

Pursuant to Section 113(a)(3) of the Clean Air Act (the Act or CAA), 42 U.S.C. § 7413(a)(3), the U.S. Environmental Protection Agency is issuing the enclosed Administrative Compliance Order (Order) (Enclosure A), requiring Williams Field Services (Williams) to comply with certain requirements of the general duty provisions of Section 112(r) of the Act at its facility, located in Codan, Mobile County, Alabama.

This Order is based on information in the EPA's possession indicating that Williams has violated the general duty provisions of Section 112(r) of the Act by failing to design and maintain a safe facility taking such steps as are necessary to prevent releases while processing, handling or storing methane, ethane, propane, butanes, and pentanes, regulated and extremely hazardous substances. Documentation of this information is presented in the enclosed electronic compact disk (Enclosure B). If Williams fails to comply with this Order, EPA may undertake additional enforcement activities under Section 113 of the Act, or other statutory or regulatory authorities.

Section 114(a) of the CAA, 42 U.S.C § 7414(a), authorizes the Administrator of EPA to require any person who owns or operates an emission source, whom the Administrator believes may have information necessary for the purposes of Section 114(a), or who is subject to any requirement of the CAA, to provide such information as the Administrator may reasonably require for the purpose of carrying out any provision of the CAA. This authority has been duly delegated to the Director of the Air, Pesticides, and Toxics Management Division, Region 4.

Pursuant to Section 114(a) of the Act, Williams is required to provide a report, and provide a statement as to whether Williams asserts a claim of business confidentiality, discussed in detail later in this letter, on the information contained on the compact disk to the EPA Region 4 office **within 20 days** of receipt of the enclosed Order. The report shall include information describing the actions that were taken within 15 days as prescribed by Paragraph 11 of the Order, or the actions that had already been taken prior to the issuance of the Order, including the specific actions undertaken to fix, repair or replace the components which led to the releases, and the measures put in place to prevent releases from occurring in the future.

Please be aware, there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341. The information shall be sent to the following Region 4 address:

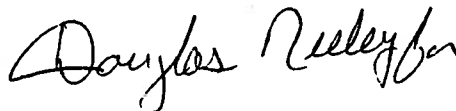
U.S. Environmental Protection Agency - Region 4  
Air, Pesticides and Toxics Management Division  
Air and EPCRA Enforcement Branch  
61 Forsyth Street  
Atlanta, Georgia 30303  
Attn: Ahmad Dromgoole

You are entitled to assert a claim of business confidentiality covering all or part of any required information, in the manner described at 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth at 40 C.F.R. Part 2, Subpart B. Unless a confidentiality claim is asserted at the time the required information is provided, EPA may make the information available to the public without further notice to you. See Enclosure C for confidential business information assertion and substantiation requirements, if there is a claim of business confidential information.

This request is not subject to the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

If you have any questions or would like to meet with representatives of the EPA to discuss the Order or the information request, please contact Ahmad Dromgoole at (404) 562-9212.

Sincerely,



Beverly H. Banister  
Director  
Air, Pesticides and Toxics  
Management Division

Enclosures: Enclosure (A)  
Enclosure (B)  
Enclosure (C)

cc: Ron Gore, Chief      Air Division (w/ Enclosures A and C)  
ADEM

Allen Schroeder (w/ Enclosures A, B, and C)  
Williams Field Services



**ENCLOSURE A**

**ADMINISTRATIVE COMPLIANCE ORDER**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4

IN THE MATTER OF:	)	
	)	Docket No. CAA-04-2012-1778
Williams Field Services, Gulf Coast, L.P.	)	
Theodore, Alabama	)	
	)	
RESPONDENT	)	
_____	)	

COMPLIANCE ORDER

I. STATUTORY AUTHORITY

This Administrative Compliance Order (Order) is issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency (EPA) by Section 113(a) of the Clean Air Act (the Act), 42 U.S.C. § 7413(a). The Administrator has delegated this authority to the Regional Administrator of EPA Region 4 by EPA Delegation 7-6-A, who in turn delegated it to the Director, Air, Pesticides and Toxics Management Division of EPA Region 4 by Region 4 Delegation 7-6-A.

II. FINDINGS

1. Williams Field Services, Gulf Coast L.P. (Williams or Respondent) is the owner and operator of a natural gas processing facility located in Coden, Mobile County, Alabama (Facility). Williams receives sweetened, dehydrated natural gas liquids from both on and offshore wells, separates the natural gas (primarily methane) from the natural gas liquids (a mixture of ethane, propane, butanes, pentanes, hexanes, and heptanes), removes any remaining impurities, pressurizes the natural gas, and transfers it to the natural gas pipeline. The major components of natural gas and natural gas liquids are methane, ethane, propane, butanes, pentanes, hexanes, and heptanes, although other volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) are present.

2. Methane, the major chemical component of the natural gas at Williams' Facility, and ethane, propane, butanes, and pentanes, major chemical components of natural gas liquids at Williams' Facility, are listed as regulated flammable substances under Table 4 of 40 C.F.R. 68.130 [Regulated



Substances for Accidental Release Prevention]. Therefore, these chemicals are regulated substances and are extremely hazardous substances under Section 112(r) of the Act.

3. Section 112(r)(1) of the Act, 42 U.S.C. § 7412(r)(1), also called the general duty clause of the Act, states that the objective of the regulations and programs authorized under this subsection is to prevent the accidental release and to minimize the consequences of any such release of any substance listed pursuant to Section 112(r)(3) or any other extremely hazardous substance. The owners and operators of stationary sources producing, processing, handling or storing such substances have a general duty to identify hazards that may result from releases using appropriate hazard assessment techniques, to design and maintain a safe facility taking such steps as are necessary to prevent releases, and to minimize the consequences of accidental releases which do occur.

4. The Williams Facility is a "stationary source" as defined by Section 112(r)(2)(C) of the Act, as amended, 42 U.S.C. § 7412(r)(2)(C), which states: "The term 'stationary source' means any buildings, structures, equipment, installations or substance emitting stationary activities (i) which belong to the same industrial group, (ii) which are located on one or more contiguous properties, (iii) which are under the control of the same person (or persons under common control), and (iv) from which an accidental release may occur."

5. On January 19, 2011, EPA inspectors conducted an air compliance inspection of the Williams Facility utilizing a Forward Looking Infrared Gas Finder Camera (FLIR)®.

6. The FLIR is an imaging technology that uses infrared radiation to detect various gases and hydrocarbons.

7. During EPA's January 19, 2011, inspection of the Williams Facility, the FLIR camera identified releases of air pollutants, including some or all of the following: ethane, propane, butanes, and



pentanes, at the hatch on the condensate storage tank (T-081). This release demonstrates, at a minimum, Respondent has failed to design and maintain a safe facility taking such steps as are necessary to prevent releases, and is in violation of Section 112(r)(1) of the Act.

8. At the time of EPA's January 19, 2011, inspection of the Williams Facility, the FLIR camera identified releases of air pollutants, including methane, ethane, propane, butanes, and pentanes, at the outlet duct at the Train 2 expander. The Toxic Vapor Analyzer (TVA) was used to confirm the presence of VOCs and read concentrations as high as 20,000 ppm. This release demonstrates, at a minimum, Respondent has failed to design and maintain a safe facility taking such steps as are necessary to prevent releases, and is in violation of Section 112(r)(1) of the Act.

9. At the time of EPA's January 19, 2011, inspection of the Williams Facility, the FLIR camera identified releases of air pollutants, including methane, at the heat exchanger for heating oil. The TVA was used to confirm the presence of VOCs and read concentrations as high as 150,000 ppm. This release demonstrates, at a minimum, Respondent has failed to design and maintain a safe facility taking such steps as are necessary to prevent releases, and is in violation of Section 112(r)(1) of the Act.

10. Williams Facility personnel were present during the inspection and witnessed the observations by EPA personnel with both the FLIR camera and TVA.

### III. ORDER

Based upon the findings set forth above, Respondent IS HEREBY ORDERED, pursuant to Section 113(a)(3) of the Act, 42 U.S.C. § 7413(a)(3) as follows:

11. Upon receipt of this Order, Respondent shall take such steps within 15 days as are necessary to prevent the release of a regulated or other extremely hazardous substance as described above, including fixing, repairing, or replacing the components that led to the releases.



#### IV. GENERAL PROVISIONS


12. The provisions of this Order shall apply to Respondent and its officers, agents, servants, employees, successors, and to all persons, firms, and corporations acting under, through or for Respondent.

13. If Respondent fails to comply with this Order, the EPA may undertake additional enforcement activities under Section 113 of the Act, or other statutory or regulatory authorities.

14. This Order shall not prevent the State or the EPA from assessing any penalties nor otherwise affect or limit the State's or the United States' authority to enforce under other provisions of the Act, nor affect any person's obligations to comply with any section of the Act or with a term or condition of any permit or applicable implementation plan promulgated or approved under the Act.

15. This Order shall be effective when issued.

4/23/12  
Date of Issuance

  
Beverly H. Banister  
Director  
Air, Pesticides and Toxics  
Management Division



**ENCLOSURE B**

**ELECTRONIC DISK WITH INFRARED CAMERA FINDINGS**



## ENCLOSURE C

### CONFIDENTIAL BUSINESS INFORMATION (CBI) ASSERTION AND SUBSTANTIATION REQUIREMENTS

You may assert a business confidentiality claim covering all or part of the information you provide in response to this information request for any business information entitled to confidential treatment under Section 114(c) of the Clean Air Act (the Act), 42 U.S.C. §7414, and 40 CFR Part 2, subpart B. Under Section 114(c) of the Act, you are entitled to confidential treatment of information that would divulge methods or processes entitled to protection as trade secrets. Under 40 CFR Part 2, subpart B, business confidentiality means the concept of trade secrecy and other related legal concepts which give (or may give) a business the right to preserve the confidentiality of business information and to limit its use or disclosure by others in order that the business may obtain or retain business advantages it derives from its rights in the information. See 40 CFR §2.201(e).

The criteria EPA will use in determining whether material you claim as business confidential is entitled to confidential treatment are set forth at 40 CFR §2.208 and 2.301. These regulations provide, among other things, that you must satisfactorily show that: (1) the information is within the scope of business confidentiality as defined at 40 CFR §2.201(e), (2) that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, (3) the information is not and has not been reasonably obtainable by legitimate means without your consent, and (4) the disclosure of the information is likely to cause substantial harm to your business' competitive edge. See 40 CFR §2.208 (a)-(d). Emission data, as defined at 40 CFR §2.301(a)(2), is expressly not entitled to confidential treatment under 40 CFR Part 2, subpart B. See 42 U.S.C. §7414(c); 40 CFR § 2.301(e).

Information covered by a claim of business confidentiality will be disclosed by EPA only to the extent, and by means of the procedures, set forth in Section 114(c) of the Act and 40 CFR Part 2, subpart B. EPA will construe your failure to furnish a business confidentiality claim with your response to this information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

To assert a business confidentiality claim, you must place on (or attach to) all information you desire to assert as business confidential either a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as trade secret, proprietary, or company confidential at the time you submit your response to this information request. Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by EPA. You should indicate if you desire confidential treatment only until a certain date or until the occurrence of a certain event.

In addition, EPA is providing you notice that if you assert a claim of business confidentiality for information you provide in response to this information request, EPA will determine whether such information is entitled to confidential treatment, pursuant to 40 CFR Part 2, subpart B. Accordingly, after EPA's receipt of your business confidentiality claim, you will receive a letter inviting your comments on the following questions:

1. What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph, and sentence when identifying the information subject to your claim.
2. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you've specified.
3. What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Is there any other explanation you deem relevant to EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.

See 40 CFR §2.204(e)(4). When you receive such a letter, you must provide EPA with a written response within the number of days set forth in the letter. EPA will construe your failure to furnish timely comments as a waiver of your confidentiality claim, consistent with 40 CFR §2.204(e)(1).